

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steve W. Rhodes
	:	
	x	

**VARNUM LLP'S REQUEST FOR PAYMENT OF  
ADMINISTRATIVE EXPENSE**

Varnum LLP, through counsel, hereby submits this request for allowance and payment of administrative expenses, pursuant to 11 U.S.C. § 503, and in support, respectfully states as follows:

**JURISDICTION AND VENUE**

1. The City of Detroit filed a petition with this Court on July 18, 2013 ("Petition Date").
2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.
3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
4. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1405 and 1409.

**GENERAL ALLEGATIONS**

1. Varnum was retained by the City of Detroit from time to time both before and after the Petition Date, to serve as ordinary course counsel to the City of Detroit. Varnum's work for the City of Detroit related primarily to telephone cable infrastructure and services.

2. Varnum was not retained by, and did not represent, the City of Detroit in connection with these bankruptcy proceedings.

3. On and after the Petition Date, Varnum rendered services to the City of Detroit for which it invoiced the City of Detroit, at agreed rates, the amount of \$143,178.05.

4. The invoices reflecting these amounts are attached hereto as **Exhibit A**.

5. Varnum's fees represent an "actual, necessary cost and expense of preserving the estate" as described in 11 U.S.C. §503(b)(1)(A).

WHEREFORE, Varnum respectfully prays for the entry of an order allowing, and directing the City of Detroit to pay, as an administrative expense under § 503 of the Code, \$143,178.05, together with any other or additional relief the Court deems just and equitable.

Dated: January 23, 2015

VARNUM LLP

/s/ Michael S. McElwee

Michael S. McElwee

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